

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

EDWARD HONIG,

Plaintiff,

- against -

CARDIS ENTERPRISES INTERNATIONAL
N.V., CARDIS ENTERPRISES (U.S.A.), and
AARON DAVID FISCHMAN,

Defendants.

2:14-CV-07548 (SJF) (GRB)

Hon. Sandra J. Feuerstein

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Affirmation of Jay M. Kaplowitz, dated February 6, 2017, and the accompanying Memorandum of Law, Sichenzia Ross Ference Kesner LLP, attorneys for Defendants Cardis Enterprises International N.V., Cardis Enterprises International (U.S.A.) Inc., and Aaron David Fischman (collectively, “Defendants”) will move this Court before the Honorable Sandra J. Feuerstein, United States District Judge for the Eastern District of New York, at the United States Courthouse, located at 100 Federal Plaza, Central Islip 11722, for an order:

- a) permitting, pursuant to Local Civil Rule 1.4, Sichenzia Ross Ference Kesner LLP to withdraw as counsel to Defendants;
- b) adjourning the status conference scheduled to take place on February 7, 2017 at 11:15 A.M. until such a time as the Court deems proper;
- c) staying all pending and further proceedings in this matter for a period of 30 days, following the written Decision of this Court on this application, to allow Defendants time to obtain new counsel in this matter; and

d) granting such other relief as the Court may deem just, equitable and proper.

PLEASE TAKE FURTHER NOTICE that, opposing affidavits and answering memoranda, if any, must be served upon the undersigned on or before February 20, 2017.

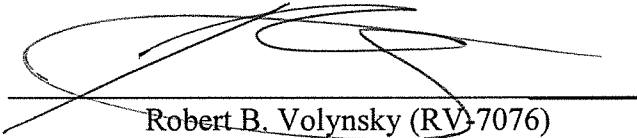
PLEASE TAKE FURTHER NOTICE that, pursuant to Judge Feuerstein's Individual Rules, the undersigned counsel will submit one courtesy copy of all papers to the Court, as soon as practicable after filing.

A form of Proposed Order is annexed hereto as Exhibit 1.

Dated: New York, New York
February 6, 2017

SICHENZIA ROSS FERENCE KESNER LLP

By: _____


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